

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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BAYTREE CAPITAL ASSOCIATES, LLC, derivatively on :
behalf of BROADCASTER, INC., :
Plaintiff, :

-against- :

NOLAN QUAN, MARTIN R. WADE III, BLAIR MILLS, :
RICHARD BERMAN, ANDREW GARRONI, JASON :
BRAZELL, ROBERT GOULD, SANGER ROBINSON, :
ALCHEMY COMMUNICATIONS, INC., FROSTHAM :
MARKETING, INC., PACIFICON INTERNATIONAL, INC., :
LONGVIEW MEDIA, INC., ACCESS MEDIA NETWORKS, :
INC., ALCHEMY F/X, INC., INNOVATIVE NETWORKS, :
INC., BINARY SOURCE, INC., BROADCASTER, LLC, :
TRANSGLOBAL MEDIA, LLC, SOFTWARE PEOPLE, LLC, :
and ACCESS MEDIA TECHNOLOGIES, LLC, :

Case No.: 08-cv-1602

(Stanton, J.)

MOTION FOR TRANSFER

Defendants, :

-and- :

BROADCASTER, INC., :

Nominal Defendant. :

X-----X

Defendants Nolan Quan, Martin R. Wade III and Blair Mills, without waiver of any right to assert any defense under the Federal Rules of Civil Procedure, by and through their attorneys, Howrey LLP, hereby join in Nominal Defendant Broadcaster, Inc.'s Motion To Transfer pursuant to 28 U.S.C. § 1404(a).

Dated: New York, New York
March 28, 2008

Respectfully submitted,

HOWREY LLP

By: 
Michael F. Armstrong

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*Attorneys for Defendants, Nolan Quan,
Martin R. Wade III and Blair Mills*

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2008 a true and correct copy of the foregoing Motion for Transfer was electronically served on the following via ECF:

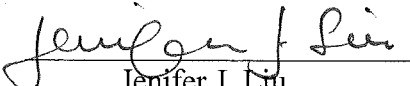
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*Attorneys for Plaintiff Baytree Capital Associates, L.L.C.
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*Attorneys for Nominal Defendant
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Dated: New York, New York
March 28, 2008


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